



Infrastructure, environment, buildings

Mr. Michael Ribordy
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Subject.
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (January 2009)

Dear Mike:

Attached is the 23rd monthly progress report for the Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA) This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

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Vice President

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SEDIMENTS

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February 16, 2009

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Our ref
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US EPA RECORDS CENTER REGION 5



407010

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

REPORT #23, JANUARY 2009

**PREPARED BY ARCADIS
FEBRUARY 16, 2009**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

**MICHAEL RIBORDY, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

REPORT #23, JANUARY 2009

Significant Developments and Activities During the Period

- On January 2, the Kalamazoo River Study Group (KRSG) submitted the 74th, 75th, and 76th *Weekly Construction Report for the Plainwell TCRA* to United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ).
- On January 6 and 14, the USEPA submitted copies of split sample data to the KRSG.
- On January 8, 14, and 30, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.
- On January 9, the KRSG submitted the *Year End Discharge Report* to MDEQ, as required by Part II, Section C, Paragraph 3 of the Substantive Requirements Document – No. MIU990025
- On January 13, the KRSG submitted the 77th *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On January 15, the KRSG submitted the 22nd *Monthly Report for the Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site TCRA* for December 2008 to USEPA
- On January 16, 20, 22, 23, and 27, the KRSG submitted copies of non-hazardous and hazardous waste manifests, turbidity logs, and surface water and soil chain-of-custodies to USEPA. These documents were normally collected from the onsite USEPA representative; however, a representative was not onsite at these times.
- On January 20, the KRSG submitted the 78th *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On January 23, MDEQ informed the KRSG that the *Site Identification Verification Form – Collection of Data for the Hazardous Waste Report – Hazardous Waste Generated or Managed* would not be required for 2008.
- On January 28, the KRSG submitted the 79th *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On January 30, the KRSG submitted the 80th *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Data Collected and Field Activities Conducted During the Period

- During the week of January 1, the KRSG continued removal of the Phase 2 Cofferdam and the WCS. Wastewater samples W_SA4N_Influ_0028, W_SA4N_MidA_0028, and W_SA4N_EffluA_0028 were collected from the treatment facility located at Staging Area 4N. Table A summarizes the samples collected. Samples were collected in accordance with Section 5 of the *TCRA Design Report*. Solidified non-TSCA material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal; solidified TSCA material was transported to the Wayne County Landfill in Bellevue, Michigan for disposal.
- During the week of January 5, the KRSG continued excavation of Removal Area 13A, continued removal of the Phase 2 Cofferdam, continued removal of the WCS, continued removal and decontamination of resuspension controls and project equipment, and began decommissioning of Staging Area 4N. One soil confirmation sample (TS20260) was collected from Removal Area 13A for PCB analysis. Two surface water samples (TS30123 and TS30124) were collected from the downstream and upstream, respectively, turbidity monitoring locations near the Phase 2 Cofferdam. Samples were collected in accordance with Section 5 of the *TCRA Design Report*. Table A summarizes the samples collected. Solidified non-TSCA material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal; solidified TSCA material was transported to the Wayne County Landfill in Bellevue, Michigan for disposal.
- During the week of January 12, the KRSG completed excavation of Removal Area 13A, removed additional sediment in Removal Area 11A near the underground utility lines that had become accessible due to decreased river elevation, continued removal of the Phase 2 Cofferdam, continued removal of the WCS, continued removal and decontamination of resuspension controls and project equipment, and continued decommissioning of Staging Area 4N. Twelve soil confirmation samples (TS20261 through TS20272) were collected from Removal Area 13A and Upland Area 13A1 for PCB analysis. The USEPA collected split samples of TS20262 and TS20270 (APS-011209-47-SD/TS20262 and APS-011309-48-SD/TS20270, respectively) in accordance with Section 17C of the February 2007 AOC. Two surface water samples (TS30125 and TS30126) were collected from the downstream and upstream, respectively, turbidity monitoring locations near the Phase 2 Cofferdam. A duplicate surface water sample (TS30127) was also collected. Samples were collected in accordance with Section 5 of the *TCRA Design Report*. Table A summarizes the samples collected. Solidified non-TSCA material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal; solidified TSCA material was transported to the Wayne County Landfill in Bellevue, Michigan for disposal.

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- During the week of January 19, the KRSG continued removal of the Phase 2 Cofferdam, continued removal of the WCS, continued removal and decontamination of resuspension controls and project equipment, and continued decommissioning of Staging Area 4N. Two surface water samples (TS30128 and TS30129) were collected from the downstream and upstream, respectively, turbidity monitoring locations near the Phase 2 Cofferdam. Samples were collected in accordance with Section 5 of the *TCRA Design Report*. Table A summarizes the samples collected. Solidified non-TSCA material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- During the week of January 26, the KRSG completed removal of the Phase 2 Cofferdam, continued removal of the WCS, continued removal and decontamination of resuspension controls and project equipment, and completed decommissioning and removal of Staging Area 4N. Two surface water samples (TS30130 and TS30131) were collected from the downstream and upstream, respectively, turbidity monitoring locations near the Phase 2 Cofferdam. Samples were collected in accordance with Section 5 of the *TCRA Design Report*. Table A summarizes the samples collected. Solidified non-TSCA material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- By January 31, all soil confirmation sampling, surface water, and wastewater sampling was completed. In addition, soil and sediment excavation was completed and all excavated and processed material had been transported offsite.
- As of December 31, approximately 87,000 cubic yards of material had been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, 9A, 9B, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, Mid-Channel Areas A, B, and C, the Phase 1 Cofferdam Area, the Phase 2 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1, 6B1, 10B1, 11A1, 12A1, 13A1, and Islands 1, 2, and 3.

Laboratory Data Received During the Period

- No analytical data were received during the week of January 1.
- During the week of January 5, the KRSG received analytical data for soil confirmation sample TS20260, USEPA split sample APS-121708-46-SD/TS20257 (collected in December), surface water samples TS30115 through TS30120 (collected in December), and wastewater samples W_SA4N_Influ_0028, W_SA4N_MidA_0028, and W_SA4N_EffluA_0028.

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- During the week of January 12, the KRSG received analytical data for soil confirmation samples TS20261 through TS20272 and USEPA split samples APS-011209-47-SD/TS20262 and APS-011309-48-SD/TS20270
- During the week of January 19, the KRSG received analytical data for surface water samples TS30121 and TS30122 (collected in December)
- During the week of January 26, the KRSG received analytical data for surface water samples TS30123 through TS30127.
- The KRSG is awaiting analytical results for surface water samples TS30128 through TS30131.

Issues Encountered and Actions Taken

- A PCB concentration of 8.8 milligrams per kilogram (mg/kg) was detected in soil sample TS20258, collected from Removal Area 13A, Grid 9A TSCA on December 30. The PCB concentration exceeded the action limit of 5 mg/kg established for the TCRA. An additional 6 inches of material was excavated, and the grid was resampled (TS20260) on January 5. A PCB concentration of 2.7 mg/kg was detected in sample TS20260. No further excavation was warranted.
- A PCB concentration of 7.0 mg/kg was detected in soil sample TS20271, collected from Upland Area 13A1, Grid 8 TSCA on January 13. The PCB concentration exceeded the action limit of 5 mg/kg established for the project. An additional 6 inches of material was excavated, and the grid was resampled (TS20272) on January 15. A PCB concentration of < 0.33 mg/kg was detected in sample TS20272. No further excavation was warranted.
- During the week of January 26, two pairs of sheets from the Phase 1 Cofferdam and ten pairs sheets from the Phase 2 Cofferdam could not be fully removed using a vibratory or an impact hammer. These sheets were cut off near the riverbed, and the upper sections of the sheets were removed. The subsurface sections of the sheet will remain in place. The location of the sheets remaining in the riverbed was recorded using a global positioning system (GPS) device.

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Developments Anticipated During the Next Reporting Period

- During the weeks of February 2 and 9, the KRSG is scheduled to complete removal of WCS.
- No activities are scheduled for the week of February 16.
- On February 26, the KRSG is scheduled to participate in the quarterly public meeting.
- The KRSG will continue to submit the *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ in February.
- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in February.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #23, January 2009

Table A — Summary of Samples Collected and Data Received in January 2009

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Soil Confirmation Samples									
APS-121708-46-SD/TS20257	12/17/08	01/06/09	0812339	TriMatrix Laboratories	RA 13A, Grid 9 (BS)	PCBs	< 0.065 mg/kg	5 mg/kg	None
TS20260	01/05/09	01/06/09	090026	KAR Labs	RA 13A, Grid 9A TSCA	PCBs	2.7 mg/kg	5 mg/kg	Re-sample of TS20258 after additional 6" of material was removed
TS20261	01/12/09	01/14/09	091137	KAR Labs	RA 13A, Grid 9C TSCA	PCBs	< 0.33 mg/kg	5 mg/kg	None
TS20262 ¹					RA 13A, Grid 8 TSCA	PCBs	1.2 mg/kg	5 mg/kg	None
APS-011209-47-SD/TS20262	01/12/09	01/14/09	0901120	TriMatrix Laboratories	RA 13A, Grid 8 TSCA	PCBs	1.0 mg/kg J	5 mg/kg	None
TS20263	1/12/2009	1/14/2009	091137	KAR Labs	RA 13A, Grid 9A	PCBs	< 0.33 mg/kg	5 mg/kg	None
TS20264	01/13/09	01/15/09	091147	KAR Labs	RA 13A, Grid 8A	PCBs	< 0.33 mg/kg	5 mg/kg	None
TS20265					RA 13A, Grid 9B	PCBs	3.1 mg/kg	5 mg/kg	None
TS20266					Upland Area 13A1, Grid 8B	PCBs	1.4 mg/kg	5 mg/kg	None
TS20267			091152	KAR Labs	Upland Area 13A1, Grid 8A	PCBs	1.1 mg/kg	5 mg/kg	None
TS20268					Upland Area 13A1, Grid 7B	PCBs	0.98 mg/kg	5 mg/kg	None
TS20269					Upland Area 13A1, Grid 7A	PCBs	1.1 mg/kg	5 mg/kg	None
TS20270 ¹					Upland Area 13A1, Grid 6	PCBs	0.34 mg/kg	5 mg/kg	None
APS-011309-48-SD/TS20270	01/13/09	01/14/09	0901133	TriMatrix Laboratories	Upland Area 13A1, Grid 6	PCBs	0.22 mg/kg J	5 mg/kg	None
TS20271	01/13/09	01/15/09	0911152	KAR Labs	Upland Area 13A1, Grid 8 TSCA	PCBs	7.0 mg/kg	5 mg/kg	Remove an additional 6" of material and resample (TS20272)
TS20272	01/15/09	01/16/09	090183	KAR Labs	Upland Area 13A1, Grid 8 TSCA	PCBs	< 0.33 mg/kg	5 mg/kg	None
Surface Water Samples									
TS30115 ²	12/12/08	01/05/09	TCRA105_SDSP	TAL	300' downstream RA 13A	PCBs	< 0.055 µg/L	No Action Limit	None
TS30116 ²					200' upstream of RA 13A	PCBs	< 0.055 µg/L	No Action Limit	None
TS30117 ²	12/18/08	01/05/09	TCRA105_SDSP	TAL	300' downstream RA 13A	PCBs	< 0.056 µg/L	No Action Limit	None
TS30118 ²					200' upstream of RA 13A	PCBs	< 0.062 µg/L	No Action Limit	None
TS30119 ²	12/23/08	01/08/09	TCRA107_SDSP	TAL	300' downstream RA 13A	PCBs	< 0.050 µg/L	No Action Limit	None
TS30120 ²					200' upstream of RA 13A	PCBs	< 0.050 µg/L	No Action Limit	None
TS30121 ²	12/30/08	01/20/09	TCRA109_SDSP	TAL	300' downstream RA 13A	PCBs	< 0.052 µg/L	No Action Limit	None
TS30122 ²					200' upstream of RA 13A	PCBs	< 0.053 µg/L	No Action Limit	None

see notes page 2

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Former Plainwell Impoundment TCRA
Monthly Report #23, January 2009

Table A — Summary of Samples Collected and Data Received in January 2009

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Surface Water Samples continued									
TS30123 ²	01/08/09	01/27/09	TCRA111_SDSP	TAL	Phase 2 Cofferdam downstream TML	PCBs	< 0.048 µg/L	No Action Limit	None
TS30124 ²					Phase 2 Cofferdam upstream TML	PCBs	< 0.048 µg/L	No Action Limit	None
TS30125 ²	01/15/09	01/27/09	TCRA111_SDSP	TAL	Phase 2 Cofferdam downstream TML	PCBs	< 0.054 µg/L	No Action Limit	None
[TS30127] ²					[PCBs]	[< 0.048 µg/L]	[No Action Limit]	[None]	
TS30126 ²					Phase 2 Cofferdam upstream TML	PCBs	< 0.049 µg/L	No Action Limit	None
TS30128 ²	01/22/09	NR	NR	TAL	Phase 2 Cofferdam downstream TML	PCBs	-	-	-
TS30129 ²					Phase 2 Cofferdam upstream TML	PCBs	-	-	-
TS30130 ²	01/29/09	NR	NR	TAL	Phase 2 Cofferdam downstream TML	PCBs	-	-	-
TS30131 ²					Phase 2 Cofferdam upstream TML	PCBs	-	-	-
Wastewater Samples									
W_SA4N_Influ_0028	01/02/09	01/05/09	090008	KAR Labs	Staging Area 4N, Discharge 28, influent sample	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA4N_MidA_0028					Staging Area 4N, Discharge 28, midpoint sample, right side	PCBs	< 0.1 µg/L	No Action Limit	None
W_SA4N_EffluA_0028					Staging Area 4N, Discharge 28, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	0.2 µg/L per discharge, Monthly Average of 2.6 x 10 ⁻⁵ µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0.1 mg/L, No Action Limit

Notes.

1 - Split of the sample collected by USEPA

2 - Work boats were demobilized during December. Surface water samples were collected from the shore line. Since the water in this area is shallow, the stainless steel bomb sampler (and associated rinse blank) was not needed.

J - The compound was positively identified, however, the associated numerical value is an estimated concentration only.

* Samples were collected in accordance with Section 5 of the TCRA Design Report.

* USEPA split samples are shown in bold and italicized font. USEPA samples collected in accordance with Section 17C of the Administrative Order of Consent.

* Duplicate samples are shown in brackets.

* Analytical results have not been validated.

(BS) - Bank Sample

NR - not received

P - phosphorus

PCBs - polychlorinated biphenyls

RA - Removal Area

TAL - TestAmerica Laboratories

TML - Turbidity Monitoring Location

TSCA - Sample collected from portion of sampling grid with PCB concentrations

greater than 50 mg/kg prior to excavation

TSS - total suspended solids

mg/kg - milligrams per kilogram

mg/L - milligrams per liter

µg/L - micrograms per liter